



**Center for Veterans Enterprise  
Procedure  
Request for Reconsideration**

**Document Version 2.0**

**Date of Issue: February 1, 2013**

**Procedure Owner: R4R Team**

**DCN: PROC-R4R-001**

**Organization:** Request for Reconsideration Team

**Document Control Number (DCN):** PROC-R4R-001

### Approval

This Procedure titled “Request for Reconsideration” is approved effective February 1, 2013.

_____	_____	_____
Task Lead (signature)	Print Name	Date
_____	_____	_____
QA (signature)	Print Name	Date
_____	_____	_____
Director, CVE (signature)	Print Name	Date

---

## Table of Contents

<b>1. INTRODUCTION .....</b>	<b>3</b>
1.1 PURPOSE .....	3
1.2 SCOPE .....	3
1.3 ROLES .....	3
• DIRECTOR .....	3
• DEPUTY DIRECTOR.....	3
• SUPERVISOR .....	3
• TEAM LEAD.....	3
• PARALEGAL .....	3
1.4 DEFINITIONS AND ACRONYMS .....	5
1.5 REFERENCES .....	6
1.6 REVISIONS.....	6
<b>2. WORKFLOW .....</b>	<b>7</b>
2.1 INITIAL VETBIZ INCLUSION APPLICATION WORKFLOW.....	7
2.2 REQUEST FOR RECONSIDERATION APPLICATION FLOW .....	7
<b>3. STAGES .....</b>	<b>8</b>
3.1 R4R INPUT.....	8
3.2 R4R EVALUATION PROCESS .....	8
3.3 HYBRID LETTER PROCEDURES .....	9
3.4 PARALEGAL REVIEW OF R4R CASE FILE .....	9
<b>4. SITE VISIT .....</b>	<b>11</b>
4.1 PARALEGAL .....	11
4.2 TEAM COORDINATOR.....	11
<b>5. CREATING DETERMINATION DOCUMENTS .....</b>	<b>12</b>
5.1 PARALEGAL .....	12
<b>6. FILING DETERMINATION DOCUMENTS .....</b>	<b>13</b>
6.1 DETERMINATION LETTER AND COVER LETTER INTO THE CASE FILE .....	13

---

## 1. Introduction

### 1.1 Purpose

To ensure an appeal process for applicants that have been denied inclusion into the Department of Veterans Affairs' VetBiz Vendor Information Pages (VIP) Verification Program.

### 1.2 Scope

The process applies after an applicant receives an initial denial letter and submitting a verification application through [www.vetbiz.gov](http://www.vetbiz.gov) or other medium. The process could also begin after an applicant receives a subsequent denial letter, based upon new information submitted during the initial Request for Reconsideration.

The request will be considered based on a finding that the applicant did not adhere to the requirements of 38 Code of Federal Regulations (CFR) Part 74 governing VA VetBiz VIP Verification Program.

### 1.3 Roles

There are several critical roles that play a part in the R4R process:

- **Director**
- **Deputy Director**
- **Supervisor**
- **Team Lead**
- **Paralegal**

#### *Reconsideration Team Full-Time Equivalent (FTE) Manager*

- Receives and monitors list of Request for Reconsiderations from Supervisory Paralegal and Administrative Clerk.
- Performs intergovernmental status check including General Accounting Office (GAO) and Small Business Administration (SBA) protests, Office of Inspector General (OIG) investigations, and debarments.
- Reviews finalized decision letters and approves letters for signature by Director.

#### *Reconsideration Team Supervisory Paralegal*

- Provides list of Request for Reconsiderations.
- Communicates with reviewing body concerning examinations of Request for Reconsiderations and examination status.
- Submits Requests for Reconsiderations requiring further review to Site Visit Coordinator and receives site visit reports.

- Receives draft decision letters from reviewing body and assigns to Paralegal staff for review.
- Delivers draft finalized decision letters for submission to FTE for review and signature
- Delivers signed decision to Administrative Clerk for further processing.
- Communicates and explains Center for Veteran Enterprise (CVE) policies to Paralegal staff.
- Forwards applications that are not Request for Reconsiderations to appropriate teams (e.g., Initiation or Evaluation Team).
- Files away company documents.

#### ***Reconsideration Team Paralegal***

- Receives assignments from Supervisory Paralegal.
- Submits Request for Reconsiderations needing additional review to Supervisory Paralegal.
- Submits revised decision letter for Supervisory Paralegal's review, if necessary.

#### ***Office of General Counsel Attorney/Examiner***

- Conducts examination of applicant's documents for reconsideration.
- Requests additional documents when needed to complete an examination.
- Submits draft decision letter to Supervisory Attorney at OGC/SITE VISIT CONTRACTORS.
- Submits draft decision letter to Supervisory Paralegal.

#### ***Reconsideration Team Administrative Clerk***

- Tracks incoming and outgoing Requests for Reconsiderations for reporting purposes.
- Prepares and updates internal log of incoming and outgoing Request for Reconsiderations for the Supervisory Paralegal and Reconsideration Team FTE Manager.
- Scans signed decision letter and submits letters as required for storage.
- When required, e-mails the decision letter to applicant and retains a hard file.

## 1.4 Definitions and Acronyms

Term	Definition
VIP	Vendor Information Pages VetBiz
Reviewer	Paralegal on the Reconsideration Team who conducts an initial review and/or drafts decision letter
CVE	Center for Veterans Enterprise
DUNS	Data Universal Numbering System
FTE	Full Time Equivalent
GAO	General Accountability Office
Hybrid	A letter that acknowledges that previous grounds for denial have been resolved; however, new issues regarding Ownership and/or Control exist.
OGC/SITE VISIT CONTRACTORS	Office of the General Counsel
OIG	Office of the Inspector General
OSDBU	Office of Small and Disadvantaged Business Utilization
P.L.	Public Law
PII	Personally Identifiable Information
POC	Point of Contact
QC	Quality Check
R4R	Request for Reconsideration
REC	Request for Reconsideration status
SDV	Service-disabled Veteran
SDVOSB	Service-disabled Veteran-owned small business
VA	Department of Veterans Affairs
VAF	VA Form
Vet	Veteran
VIP	Vendor Information Pages
VOSB	Veteran-owned small business
VPN	Virtual Private Network

---

## 1.5 References

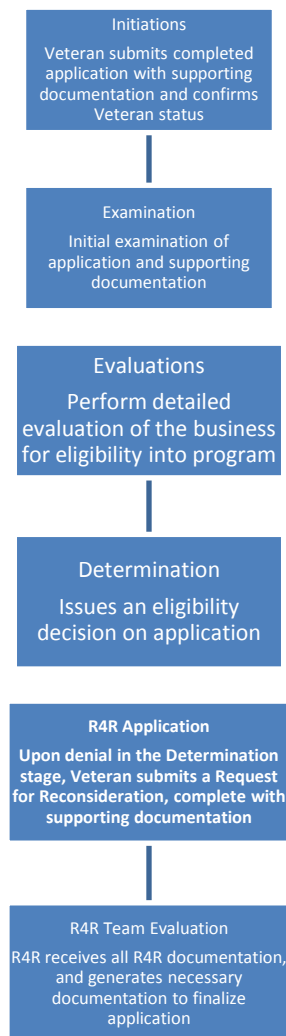
38 Code of Federal Regulations (CFR) Part 74  
Public Law 111-275

## 1.6 Revisions

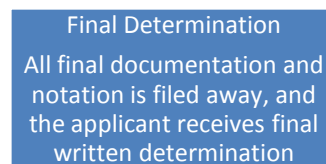
Revision Number	Date of Issue	Brief Description of Change
1.0	April 2, 2012	Initial Submission for Approval
2.0	February 1, 2013	Major update
2.1	April 8, 2013	Major Update

## 2. Workflow

### 2.1 Initial VetBiz Inclusion Application Workflow



### 2.2 Request for Reconsideration Application Flow





---

### 3. Stages

#### 3.1 R4R Input

- 3.1.1 The process begins with the applicant initiating Request for Reconsideration, and the Request. It is during this process that CVE ensures the file is ready for R4R evaluation:
- 3.1.2 Applicant receives initial denial letter from the Center for Veterans Enterprise (CVE) and is given 30 days from the date of the letter to submit a Request for Reconsideration and comply with any additional requests for information.
- 3.1.3 Submission of Request for Reconsideration is received in the following manner:
- 3.1.4 E-mail or
- 3.1.5 A hard copy is received by The Center for Veterans Enterprise (CVE) via regular mail or interoffice mail from the Office of Small and Disadvantaged Business Utilization (OSDBU) ; or
- 3.1.6 CVE then processes the submitted documents:
- 3.1.7 An approval, denial or hybrid denial letter is drafted
- 3.1.8 Where appropriate, supporting documents addressing resolution of issues that failed to meet 38 CFR Part 74 requirements prompting denial
- 3.1.9 On-site examination and site visit report addressing concerns for additional review

#### 3.2 R4R Evaluation Process

- 3.2.1 R4R application is submitted from the applicant and handled by the R4R mail monitor.
- 3.2.2 The case is then sent to the R4R Team Coordinator and forwarded to OGC, or site visit contractors.
- 3.2.3 Examination of the entire file is made by OGC.
- 3.2.4 Determination is made with regard to errors.
  - 3.2.4.1.If there are any additional reasons for denial, or if there is a need to overturn element(s) of the initial determination these points are annotated and captured.
  - 3.2.4.2.During this process, reviewing entity keeps a record of all data entered and/or received, along with any and all errors that are found with relation to each case.
- 3.2.5 OGC and or site visit contractors provide a final determination recommending either the applicant be approved or denied, based upon all documentation submitted.

- 3.2.6 Review authority then drafts a determination letter outlining the reasons for approval, denial, or hybrid denial.
- 3.2.7 The R4R Team Coordinator is alerted that the case is ready for review.
- 3.2.8 The R4R Team Coordinator assigns the case to a Paralegal.
- 3.2.9 The Paralegal reviews and formats the letter using procedures found in Paragraph 3.4 of this SOP prior to forwarding case file.
- 3.2.10 The R4R Team Supervisor reviews the letter and forwards it to the Evaluation Team Lead or designated representative.
- 3.2.11 The Evaluation Team Lead forwards the case to the Determination Team to be signed by either the Director or Deputy Director of CVE.
- 3.2.12 END PROCESS.

### 3.3 Hybrid Letter Procedures

- 3.3.1 If OGC finds additional denial reasons in review of evaluation denial case or review of other hybrid cases completed by OGC, this case will be deemed a hybrid denial.
- 3.3.2 Additional denial reasons will be added to denial letter sent to applicant.
- 3.3.3 If a case becomes a hybrid the applicant will be allowed to respond to all issues in an effort to clear expanded denial issues. Process hybrid denial letter. Process will go to Step 3.2.1.

Output	Detail of Outputs and Remarks
Denial Letter	<ul style="list-style-type: none"><li>• Applicant has not met the requirements of 38 CFR Part 74</li><li>• Applicant can reapply after 6 months</li></ul>
Approval Letter	<ul style="list-style-type: none"><li>• Applicant has satisfied the requirements of 38 CFR Part 74</li></ul>
Hybrid Letter	<ul style="list-style-type: none"><li>• Applicant resolved issues prompting denial but new issues require resolution.</li><li>• Applicant has 30 days to submit supporting documentation that meets the requirements of 38 CFR Part 74</li></ul>

### 3.4 Paralegal Review of R4R Case File

#### *Receiving and Reviewing the Case File*

- Step 1** Receive Team Lead assignment of R4R case
- a) Team Lead will assign case to Paralegal

- b) Team Lead will also assign the case as a Task to Paralegal.

**Step 5** The Paralegal will gather the supporting documents for determination.

**Step 6** The Paralegal will determine if additional documentation is required to begin the review process.

- a. If 'Yes'

Annotate the case file and got to Step 7

- b. If 'No'

The Paralegal will notify the R4R Team Coordinator who will contact the applicant requesting additional documentation.

**Step 7** The Paralegal will review the documents for compliance with ownership and control requirements of 38 Code of Federal Regulations (CFR) Part 74. Some documents to consider when reviewing are:

- a. Request for Reconsideration letter from applicant
- b. Documents uploaded by applicant addressing reasons for denial in initial denial letter
- c. Initial denial letter
- d. OGC/site visit contractors draft of Request for Consideration denial letter

**Step 8** After reviewing supporting documents, the Paralegal will determine if ground(s) for denial have been resolved. If no, create denial decision letter. If yes, create approval decision letter. If ground(s) for denial have been resolved, yet new ground(s) have been discovered, create hybrid denial decision letter.

**Step 9** If no determination can be made after reviewing all supporting documents, then a site visit will be initiated.

---

## 4. Site Visit

There are occasions when an applicant's file reaches Request for Reconsideration, and the Paralegal needs more solid evidence to make a final determination. To acquire the evidence needed, the Paralegal requests what is known as a "Site Visit." A Site Visit is the means by which the CVE Risk Mitigation Team provides robust post-approval compliance and validation framework by identifying non-compliance and misrepresentation. This includes: (1) examining the ownership and control of applicant companies as part of CVE's verification process, (2) in-depth document reviews, and (3) announced and unannounced on-site visits.

### *Requesting a Site Visit*

#### 4.1 Paralegal

- Step 1** Determine if application is in need of additional review or Site Visit based upon Regulation criteria.
- Step 2** If yes, send a request to the Request for Reconsideration Team Coordinator with a synopsis of why the site visit is needed.
- Step 3** After the site visit has been completed; the Paralegal will be notified as to how to proceed with finalizing case.

#### 4.2 Team Coordinator

- Step 1** The R4R Team coordinator sends an email to Site Visit Team requesting Site Visit [(include type (14 or 30 day, announced or unannounced, or Document Review), and specific concerns or questions (if any))].
- Step 2** The R4R Team coordinator updates the case file to reflect the request for Site Visit.
- Step 3** Once the Site Visit is complete, the report is submitted by the Site Visit Examiner, and the Team Coordinator is notified. The Team Coordinator will then make the decision as to how to proceed with the case file, and alert the Paralegal.

---

## 5. Creating Determination Documents

Once the file has been reviewed and a final determination decision has been reached, a determination letter is generated reflecting the decision to either approve, deny or render a hybrid denial to the applicant. In conjunction with the decision letter, a cover letter is created reflecting a brief synopsis of pertinent information associated with each file.

### 5.1 Paralegal

#### 5.1.1 Letter Creation

##### *Creating the Approval Letter*

- Step 1** Copy findings of letter from OCG/Site visit contractors. Paste into Word document template
- Step 2** Ensure that format follows Request for Reconsideration Checklist
- Step 3** Save file name as: “company name\_DUNS number\_Approval\_your initials”

##### *Creating the Denial Letter*

- Step 1** Copy findings of letter from OGC/Site visit contractors. Paste into Word document template
- Step 2** Ensure that format follows Request for Reconsideration Checklist
- Step 2** Save file name as “company name\_DUNS number\_Denial\_your initials”

##### *Creating the Hybrid Denial Letter*

- Step 1** Copy findings of letter from OCG/Site visit contractors. Paste into Word document template
- Step 2** Ensure that format follows Request for Reconsideration Checklist
- Step 3** Save file name as “company name\_DUNS number\_Hybrid Denial\_your initials”

#### 5.1.1.1. Cover Letter Creation

- Step 1** Ensure that format follows Request for Reconsideration Checklist
- Step 2** Save file name as “company name\_DUNS number\_Cover Letter\_your initials”

##### *R4R Team Coordinator*

- a. Conducts second review or assigns to another Reviewer for a second review.

##### *FTE Manager*

- b. Approves letter and sends to the Executive Team for signature by the Director or Deputy Director.

---

## 6. Filing Determination Documents

Once all of the documentation has been properly created it is then put into the case file for tracking and verification purposes. Likewise, remarks are entered into the case file for each case to document how R4R rendered the decision. If R4R agrees with the determination rendered from OGC/Site visit contractors, then Paralegal will enter Remarks indicating the agreement. If R4R does not agree with the determination rendered from OGC/ Site visit contractors, then Paralegal will enter Remarks indicating the non-agreement.

### 6.1 Determination Letter and Cover Letter into the Case File

- Step 1.** Change the Status to “Completed”
- Step 2.** Enter any pertinent notes to the case in the Description Box
- Step 3.** Attach the Cover Letter
- Step 4.** Verify all information is correct, and that all pertinent documents have been included in the case file
- Step 5.** Enter the following verbage into the case file:  
R4R Paralegal reviewed and formatted the letter received from OGC/Site visit contractors, along with pertinent business documents submitted by the applicant. OGC/Site visit contractors recommended approval/denial/hybrid denial. I concur. Forwarded to R4R Coordinator for review.
- Step 6.** Verify that the case file has been successfully updated.